From: Erica Brown
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:34:02 PM

The new director of the OGE promised to hold federal officials responsible for their actions, and promised to make legal expense funds "transparent, open, and accessible to the public."

The new regulation FAILS to hold officials to account.

Ethics cannot - MUST NOT - be left optional.

I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:
- remove the exception that makes compliance with the regulation optional;
- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
- remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for your attention to this matter.

Sincerely,

Erica Brown